

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

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In re: BAIR HUGGER FORCED AIR  
WARMING DEVICES PRODUCTS  
LIABILITY LITIGATION

MDL No. 15-2666 (JNE/FLN)

This Document Relates To:  
All Actions

**DECLARATION OF  
DEBORAH E. LEWIS IN SUPPORT  
OF DEFENDANTS' OPPOSITION TO  
PLAINTIFFS' MOTION TO  
EXCLUDE THE OPINIONS AND  
TESTIMONY OF ANTONIA HUGHES,  
RN, BSN, MA, CNOR**

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Deborah E. Lewis, being first duly sworn, deposes and declares:

I am an attorney at the law firm of Blackwell Burke P.A., and one of the attorneys representing 3M Company and Arizant Healthcare Inc. (together, "Defendants") in this litigation. I submit this declaration in support of Defendants' Opposition to Plaintiffs' Motion to Exclude the Opinions and Testimony of Antonia Hughes. Unless otherwise stated, the facts set forth herein are based upon my personal knowledge, information, and belief.

1. Attached as Defendants' Exhibit DX1 is a true and correct copy of Antonia Hughes' Expert Report.
2. Attached as Defendants' Exhibit DX2 is a true and correct copy of the transcript of the deposition of Antonia Hughes.
3. Attached as Defendants' Exhibit DX3 is a true and correct copy of Ex 5 from the deposition of Dr. William Jarvis, which is a publication entitled Mangram, A., et

al., “Guideline for prevention of surgical site infection, 1999,” 27 *American Journal of Infection Control* 97 (1999).

I declare under penalty of perjury that the foregoing is true and correct.

Dated: October 3, 2017

Respectfully submitted,

s/Deborah E. Lewis

Deborah E. Lewis